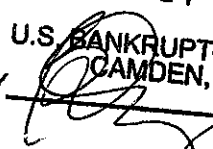


**CALLAGHAN THOMPSON & THOMPSON, P.A.**

William A. Thompson, III  
2428 Atlantic Avenue  
Atlantic City, NJ 08401  
(609) 348-5300  
ID #027851985  
Attorney for Defendant

**FILED**  
JEANNE A. NAUGHTON, CLERK  
**FEB 27 2017**  
U.S. BANKRUPTCY COURT  
CAMDEN, N.J.  
BY  DEPUTY

In Re:

FRANCES HAQUE

Debtor

FRANCES HAQUE

Plaintiff

v.

SKYLINE CONDOMINIUM  
ASSOCIATION, THOMPSON REALTY  
COMPANY; CALLAGHAN, THOMPSON &  
THOMPSON, PA and WILLIAM A.  
THOMPSON, III, ESQUIRE

Defendant

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

CASE NO: 13-36691-ABA

ADVERSARY NO: 17-01117-ABA

**ANSWER**

Defendants Skyline Condominium Association and Thompson Realty Company answer and say:

1. Admitted.
2. Admitted.
3. Denied. Thompson Realty Co. is a New Jersey corporation.
4. Does not apply to these defendants.
5. Does not apply to these defendants.
6. Neither admitted nor denied.
7. Neither admitted nor denied.
8. Neither admitted nor denied.
9. Admitted.

10. Denied. Schedule D attached to Plaintiff's Complaint does not identify Mr. Thompson as counsel for Skyline.
11. Admitted that a discharge order was entered on the date listed.
12. Neither admitted nor denied.
13. Admitted that a Complaint was filed under the docket number listed by attorney William A. Thompson, III. Denied that Skyline Condominium Association directed the debts to be included.
14. Does not apply to these defendants.
15. Does not apply to these defendants.
16. Denied as to Skyline Condominium Association. The correspondence referred to took place between counsel and not directly with Skyline.
17. Does not apply to these defendants.
18. Does not apply to these defendants.
19. Does not apply to these defendants.
20. Admitted that a Complaint was filed under the referenced docket number. Denied that Skyline directed what fees were to be included in the Complaint.
21. Neither admitted nor denied.
22. Denied on behalf of Skyline. The summary judgment motion was filed by the attorneys without the direction or input of Skyline.
23. Does not apply to these defendants.
24. Does not apply to these defendants.
25. These defendants repeat each and every allegation of the preceding paragraphs as if fully set forth herein.
26. Admitted that the statutory section reads as listed.
27. Skyline takes no position on this statement and leaves the legal conclusion to its counsel.
28. Denied. The decision on what assessments to include in the Complaint was solely the responsibility of counsel and not Skyline.
29. Denied.

30. Denied.

**WHEREFORE**, Defendant demands that Plaintiff's Complaint be dismissed as to Skyline Condominium Association, together with attorney's fees and cost of suit.

31. Defendants repeat each and every response to the foregoing paragraphs as if fully set forth herein.

32. Admitted.

33. Admitted.

34. Does not apply to these defendants.

35. Admitted.

36. Admitted.

37. Denied as to Skyline Condominium Association and Thompson Realty. Thompson Realty did not file any action at all, and Skyline Condominium did not direct what amounts to be included in the first or second action. Skyline and Thompson Realty took no actions contrary to the discharge order.

38. Denied.

**WHEREFORE**, Defendants Skyline Condominium Association and Thompson Realty Company demand that Plaintiff's Complaint be dismissed, together with attorney's fees and costs of suit.

39. Defendants repeat each and every response to the preceding paragraphs as if fully set forth herein.

40. Admitted.

41. Admitted.

42. Admitted.

43. Denied. Thompson Realty is not a debt collector. Thompson Realty is the management company in charge of the everyday operation of the condominium. Thompson

Realty is not in the business of debt collection. Thompson Realty Company is an employee of Skyline Condominium Association, the creditor, and as such is excluded from the definition of debt collector.

44. Does not apply to these defendants.

45. Does not apply to these defendants.

46. Denied as to Thompson Realty.

47. Denied as to Thompson Realty.

48. Denied as to Thompson Realty.

**WHEREFORE**, Defendant Thompson Realty Company demands that Plaintiff's Complaint be dismissed, together with attorney's fees and costs of suit.

Dated:

2/23/17



William A. Thompson, III  
Attorney for Defendants Skyline  
Condominium Association and  
Thompson Realty Co.